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March 13, 1998

### Via Hand-Delivery

K. David WaddellExecutive SecretaryTennessee Regulatory Authority460 James Robertson ParkwayNashville, Tennessee 37243-0505

Re:

BellSouth Telecommunications, Inc.'s Entry Into Long Distance ("InterLATA") Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996; Docket No. 97-00309 - Motion for Extension of Time to File Response to Discovery Requests from the Consumer Advocate Division

Dear Mr. Waddell:

Enclosed for filing is the original and thirteen (13) copies of the Motion of TCG MidSouth, Inc. for an extension of time until 12 noon on Friday, March 20, 1998 to file responses to the Consumer Advocate's discovery requests. TCG plans to file its response as confidential information pursuant to the Protective Order dated, February 25, 1198 in this docket. Please be advised that I have contacted the Consumer Advocate's Office and the Consumer Advocate has no objections to this extension.

Sincerely,

D. Billye Sanders

D. Billye Sanders

DBS:lmb w/Enclosures

cc: Parties of Record

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE: BELLSOUTH	)	
TELECOMMUNICATIONS, INC'S	)	
ENTRY INTO (INTERLATA) SERVICE	)	DOCKET NO. 97-00309
IN TENNESSEE PURSUANT TO	)	
SECTION 271 OF THE	)	
TELECOMMUINCATIONS ACT OF	)	
1996	)	

# MOTION OF TCG MIDSOUTH, INC. FOR EXTENSION OF TIME TO FILE RESPONSES TO THE CONSUMER ADVOCATE'S FIRST DISCOVERY REQUESTS TO TCG MIDSOUTH, INC.

Comes now TCG MidSouth, Inc. ("TCG") and respectfully requests an extension of time until 12:00 noon on Friday, March 20, 1998 to file its responses to the Consumer Advocate's discovery requests which was filed on March 6, 1998. In support of said motion, TCG states the following:

- 1. Said responses were due to the Consumer Advocate on March 13, 1998 at 12:00 noon.
- 2. TCG's internal staff needs additional time to gather the information necessary to respond to the data requests.
- 3. Counsel for TCG has contacted the office of the Consumer Advocate, and the Consumer Advocate does not object to this request.
- 4. If TCG is able to compile the information necessary to respond to the data requests prior to March 20, it will do so.
- 5. This extension is not intended to delay the prompt and orderly conduct of these proceedings.

## Respectfully submitted,

D. Billye Sanders, Esq.

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12/03/133/ 13:3/ 010-141-3010

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97-00309

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